

**Johnson, Jere**

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**From:** Jere Johnson [[Johnson.Jere@epamail.epa.gov](mailto:Johnson.Jere@epamail.epa.gov)]  
**Sent:** Wednesday, March 26, 2014 3:23 PM  
**To:** Johnson, Jere  
**Subject:** Fw: Comstock Mining  
**Attachments:** 15. 11-10-12 CRMS East side Sample Results\_AutoReport\_1108\_1108385\_wQC.pdf; 13. 2008 AOC Summary Report.pdf; 14.Outcropping Results.pdf

Jere Johnson  
 Remedial Project Manager (SFD 8-2)  
 U.S. Environmental Protection Agency  
 75 Hawthorne Street  
 San Francisco, CA 94105  
 415.972.3094 (direct)  
 415.947.3526 (fax)

If I don't respond to a message, I may be out of the office.  
 Security settings do not permit my "Out of Office" automatic e-mail response to be shared outside of EPA.  
 ----- Forwarded by Jere Johnson/R9/USEPA/US on 03/26/2014 03:22 PM -----

From: "Cindi Byrns" <[byrns@comstockmining.com](mailto:byrns@comstockmining.com)>  
 To: Kathi Moore/R9/USEPA/US@EPA, Eric Esler/R9/USEPA/US@EPA, Jere Johnson/R9/USEPA/US@EPA,  
 Cc: <[glovato@ndep.nv.gov](mailto:glovato@ndep.nv.gov)>, "Jeff Collins" <[jrcollins@ndep.nv.gov](mailto:jrcollins@ndep.nv.gov)>, "McIntosh, Carolyn" <[CMcIntosh@PattonBoggs.com](mailto:CMcIntosh@PattonBoggs.com)>  
 Date: 02/24/2012 12:06 PM  
 Subject: Comstock Mining

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This is 4 of 4.

Cindi Byrns  
 Director of Environmental and Regulatory Management

702-927-3795(See attached file: 13. 2008 AOC Summary Report.pdf)(See attached file: 14.Outcropping Results.pdf)(See attached file: 15. 11-10-12 CRMS East side Sample Results\_AutoReport\_1108\_1108385\_wQC.pdf)

9/19/2011

Plum Mining  
PO Box 1118  
Virginia City, NV 89440  
Attn: Larry Martin

OrderID: 1108385

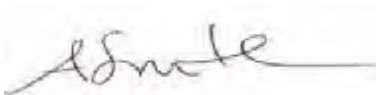
Dear: Larry Martin

This is to transmit the attached analytical report. The analytical data and information contained therein was generated using specified or selected methods contained in references, such as Standard Methods for the Examination of Water and Wastewater, 18th & 19th editions, Methods for Determination of Organic Compounds in Drinking Water, EPA-600/4-79-020, and Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW846) Third Edition.

The samples were received by WETLAB-Western Environmental Testing Laboratory in good condition on 8/23/2011. Additional comments are located on page 2 of this report.

If you should have any questions or comments regarding this report, please do not hesitate to call.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Smith", is written over a light blue rectangular background.

Andy Smith  
QA Manager

# Western Environmental Testing Laboratory

## Report Comments

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Plum Mining - 1108385

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### General Comments

None

### Specific Comments

None

### Data Qualifier Legend

- B -- Blank contamination; Analyte detected above the method reporting limit in an associated blank
- HT -- Sample held beyond the accepted holding time
- J -- The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit
- M -- Reported value is estimated; The sample matrix interfered with the analysis
- N -- There was insufficient sample available to perform a spike and/or duplicate on this analytical batch.
- NC -- Not calculated due to matrix interference
- Q -- Reported value is estimated; The value failed to meet QC criteria for either precision or accuracy
- SC -- Spike recovery not calculated. Sample concentration >4X the spike amount; therefore, the spike could not be adequately recovered.

## Western Environmental Testing Laboratory Analytical Report

Plum Mining  
PO Box 1118  
Virginia City, NV 89440

Attn: Larry Martin

Phone: (775) 847-5272 Fax: (775) 847-4762

Date Printed: 9/19/2011

OrderID: 1108385

Customer Sample ID: HM 1/1 082311 0-7 Comp

Collect Date/Time: 8/23/2011

WETLAB Sample ID: 1108385-015

Receive Date: 8/23/2011 17:30

Parameter	Method	Results	Units	Reporting Limit	Date Analyzed
Arsenic	SW846 6010B	18	mg/kg	1.4	8/31/2011
Lead	SW846 6010B	42	mg/kg	0.47	8/31/2011
Mercury	SW846 7471A	0.55	mg/kg	0.040	9/13/2011

Customer Sample ID: HM 1/4 082311

Collect Date/Time: 8/23/2011

WETLAB Sample ID: 1108385-018

Receive Date: 8/23/2011 17:30

Parameter	Method	Results	Units	Reporting Limit	Date Analyzed
Arsenic	SW846 6010B	16	mg/kg	1.5	8/31/2011
Lead	SW846 6010B	160	mg/kg	0.49	8/31/2011
Mercury	SW846 7471A	0.33	mg/kg	0.038	9/13/2011

## Western Environmental Testing Laboratory QC Report

QCBatchID	QCType	Parameter	Method	Result	Units							
QC11081014	Blank 1	Arsenic	SW846 6010B	0.20	mg/kg							
		Lead	SW846 6010B	<0.01	mg/kg							
QC11090380	Blank 1	Mercury	SW846 7471 A	<0.10	mg/kg Dry							
QCBatchID	QCType	Parameter	Method	Result	Actual	% Recovery	Units					
QC11081014	LCS 1	Arsenic	SW846 6010B	49.6	50.0	99	mg/kg					
		Lead	SW846 6010B	51.5	50.0	103	mg/kg					
QC11090380	LCS 1	Mercury	SW846 7471 A	0.191	0.167	114	mg/kg					
QCBatchID	QCType	Parameter	Method	Spike Sample	Sample Result	MS Result	MSD Result	Spike Value	Units	MS % Rec.	MSD % Rec.	RPD
QC11081014	MS 1	Arsenic	SW846 6010B	1108385-011	19.3	66.0	62.9	50.0	mg/kg	93	87	5 %
		Lead	SW846 6010B	1108385-011	52.3	94.4	91.3	50.0	mg/kg	84	78	3 %
QC11090380	MS 1	Mercury	SW846 7471	1109113-001	<2.58	14.3	16.1	10.5	mg/kg Dr	126	138	12 %

**Billie the Kid Mine**  
**Storey & Lyon Counties, Nevada**

**ADMINISTRATIVE ORDER ON CONCENT**  
**Dated July, 24, 2008**

**Summary Report on Drill Fluid and Hydrocarbon Clean Up**

**THE PLUM MINING COMPANY, LLC**  
Subsidiary of  
GoldSpring, Inc.  
1200 American Flat Road  
Gold Hill, Nevada

*Prepared for:*

Nevada Division of Environmental Protection  
Bureau of Mine Regulation & Reclamation  
901 South Stewart Street, Suite 4001  
Carson City, NV 89701

August 8, 2008

## **1.0 INTRODUCTION**

The Plum Mining Company – Billie the Kid Project respectfully submits this Summary Report on the Drill Fluid and Hydrocarbon Clean Up for spills that occurred during the week of June 22, 2008. The spills were observed by Bureau of Mining Regulation & Reclamation Staff on June 26, 2008 and drill activities were suspended on June 27, 2008 upon receipt of a notice to suspend drilling activities.

The violation became part of the July 24, 2008 Administrative Order On Consent. The conditions in the AOC included clean up of the spilled drill fluid and a written report that memorializes the clean up efforts.

## **2.0 DRILL FLUID CLEAN UP ACTIVITIES**

On June 27, 2008 Todd Process, Engineer/Permit Writer with the BMRR gave Dennis Anderson, Senior Engineer with GoldSprings, Inc. the notice for Suspension of Unauthorized Drill Activities and a set of photos that documented the spilled drill fluid and hydrocarbon spills at the GoldSprings drill sites along the east side of State Highway 342. Drilling activities were suspended within hours of receiving the notice.

Mr. Anderson conferred with Mr. John Jordan, Plum Mining Company contractor that is responsible for the drill site reclamation on June 27, 2008. Mr. Anderson and Mr. Jordan visited the drill sites where the spills had occurred and discussed the clean up program that Mr. Jordan would manage.

Drill fluid and spilled hydrocarbon clean up activities were commenced in the afternoon of June 27, 2008 and the majority of the clean up was finished by Sunday, June 29. Additional clean up was performed on June 30, and August 1, 2008. The hydrocarbon contaminated soil was excavated and placed in 55 gallon drums which are currently at the Billie the Kid process facility site. The hydrocarbon contaminated material will be managed according to approved disposal or treatment protocol. The soil areas that had the inert drill fluid spilled on it was excavated from the spill areas and then buried on site at the drill mud pit reclamation areas. On August 2, 2008 Mr. Process, Mr. Jordan and Mr. Anderson reviewed the field clean up efforts and concurred that the clean up was satisfactory.

A Photo Log is included with this written summary report as Appendix A.

## **3.0 CONCLUSION**

This written summary report on drill fluid clean up activities is being submitted in compliance with the June 24, 2008 AOC between the Nevada Division of Environmental Protection and The Plum Mining Company, LLC.



Dennis M. Anderson, Senior Engineer, GoldSprings, Inc.

APPENDIX A  
CLEAN UP PHOTO LOG



THE PLUM MINING COMPANY, LLC  
**Summary Report on Drill Fluid and Hydrocarbon Clean Up**



*Drill Fluid*



*Clean Up Area*

THE PLUM MINING COMPANY, LLC  
**Summary Report on Drill Fluid and Hydrocarbon Clean Up**



*Drill Fluid Clean Up Area*



THE PLUM MINING COMPANY, LLC  
Summary Report on Drill Fluid and Hydrocarbon Clean Up



Hydrocarbon Spills

THE PLUM MINING COMPANY, LLC  
Summary Report on Drill Fluid and Hydrocarbon Clean Up



Hydrocarbon Spills



THE PLUM MINING COMPANY, LLC  
Summary Report on Drill Fluid and Hydrocarbon Clean Up



*Hydrocarbon Spills*



*Cleaned Up*

THE PLUM MINING COMPANY, LLC  
Summary Report on Drill Fluid and Hydrocarbon Clean Up



*Hydrocarbon Spills*



*Cleaned Up*



Sample_ID	UTM_Easting	UTM_Northing	As_ppm	Hg_ppm	Pb_ppm
BT-5	271433	4349892	7.0	0.300	4.1
CMJRW-01	271406	4349479	125.0	0.080	28.0
CMJRW-02	271491	4349495	66.4	0.050	23.0
CMJRW-06	271396	4349516	13.0	-0.020	14.0
CMJRW-16	271429	4349426	21.2	0.030	22.0
CMJRW-17	271472	4349434	18.3	-0.020	21.0
CMJRW-18	271481	4349438	37.4	-0.020	47.0
CMJRW-20	271681	4349322	63.6	0.030	93.0
CMJRW-22	271435	4349600	22.6	-0.020	31.0
FP11-01	272177	4348528	62.9	0.107	34.0
FP11-02	272177	4348528	53.4	0.150	36.0
FP11-03	272177	4348528	55.7	0.055	38.0
H11-01	271212	4349971	11.3	0.220	35.0
H11-03	271210	4349999	10.9	-0.020	16.0
H11-06	271246	4350017	17.5	-0.020	14.0
H11-09	271245	4350025	10.9	0.200	35.0
H11-12	271335	4350023	68.6	0.340	11.0
H11-15	271239	4350086	63.5	0.130	20.0
HT-1	271205	4350098	3.0	0.200	3.2
J-1A	270918	4350811	122.0	0.070	31.0
J-1B	270918	4350811	47.6	0.040	20.0
J-1C	270918	4350811	39.4	0.120	46.0
J-2A	270961	4350750	91.3	0.080	17.0
J-2B	270961	4350750	34.8	0.060	21.0
J-3	270968	4350729	23.0	0.040	18.0
J-4	270979	4350697	34.3	-0.020	16.0
J-5	270982	4350691	44.3	-0.020	18.0
J-6	270992	4350660	18.4	-0.020	17.0
J-7	270993	4350670	19.8	-0.020	22.0
J-8A	270999	4350674	33.0	0.030	14.0
J-8B	270999	4350674	15.6	0.020	13.0
JG-1	270940	4350786	20.8	0.030	17.0
JG-2	270940	4350786	40.6	-0.020	12.0
JG-3	270940	4350786	21.0	-0.020	20.0
JG-4	270940	4350786	27.7	0.070	12.0
JG-5	270940	4350786	68.2	0.270	34.0
JG-6	270940	4350786	23.8	0.070	18.0
JG-7	270940	4350786	8.2	0.030	13.0
JG-8	270940	4350786	24.6	0.050	16.0
K-1A	270875	4350983	30.2	0.180	30.0
K-1B	270875	4350983	17.3	0.030	20.0
K-2	270851	4351063	49.5	0.070	24.0
K-3A	270855	4351037	64.6	0.150	17.0
K-3B	270855	4351037	19.2	0.040	10.0
K-4	270870	4351028	15.8	0.050	10.0
KC11-1-1	271581	4350034	28.8	0.074	15.0

KC11-1-2	271589	4350031	16.1	0.114	9.0
KC11-12-1	271254	4348895	27.4	-0.020	29.0
KC11-12-10	271402	4349000	41.8	0.047	65.0
KC11-12-11	271361	4349042	45.4	-0.020	37.0
KC11-12-12	271247	4349050	2.9	-0.020	29.0
KC11-12-13	271334	4349086	34.0	0.020	26.0
KC11-12-14	271392	4349102	23.0	0.032	70.0
KC11-12-15	271359	4349097	49.6	0.028	42.0
KC11-12-16	271330	4349144	48.9	0.049	83.0
KC11-12-17	271477	4349158	19.8	0.047	4700.0
KC11-12-2	271278	4348913	35.9	-0.020	27.0
KC11-12-3	271395	4348881	164.0	-0.020	43.0
KC11-12-4	271362	4348947	10.2	-0.020	39.0
KC11-12-5	271184	4349035	20.0	-0.020	1080.0
KC11-12-6	271062	4348948	16.4	0.020	47.0
KC11-12-7	271224	4348752	32.2	0.021	39.0
KC11-12-8	271337	4349003	51.3	-0.020	28.0
KC11-12-9	271404	4348987	22.3	-0.020	29.0
KC11-1-3	271655	4349979	19.3	0.065	29.0
KC11-1-4	271800	4349801	22.8	0.260	14.0
KC11-1-5	271581	4349978	22.4	0.633	27.0
KC11-1-6	271578	4349956	13.4	0.151	20.0
KC11-1-7	271527	4350007	129.0	1.055	47.0
KC11-1-8	271527	4350007	36.7	0.525	83.0
KC11-1-9	271506	4350047	18.5	0.116	22.0
KC11-19-11	270962	4348963	72.3	0.069	286.0
KC11-19-12	270957	4348978	443.0	1.456	65.0
KC11-19-13	270953	4348982	225.0	0.173	40.0
KC11-19-14	270956	4348985	233.0	0.084	60.0
KC11-19-15	270952	4349001	22.3	0.025	116.0
KC11-19-16	270959	4349068	223.0	-0.020	46.0
KC11-26-1	271441	4348779	22.4	0.051	9.0
KC11-26-12	271488	4349098	12.6	0.026	78.0
KC11-26-13	271446	4349197	20.3	0.258	0.0
KC11-26-14	271481	4349101	3.8	0.030	248.0
KC11-26-2	271410	4348810	114.0	0.044	33.0
KC11-26-3	271447	4348740	8.5	0.037	8.0
KC11-26-4A	271413	4348696	20.4	0.025	11.0
KC11-26-4B	271416	4348697	41.5	-0.020	14.0
KC11-26-4C	271416	4348697	17.2	0.022	18.0
KC11-26-4D	271413	4348696	8.1	-0.020	17.0
KC11-26-5A	271615	4348737	11.1	-0.020	7.0
KC11-26-5B	271615	4348737	140.0	-0.020	28.0
KC11-26-6	271622	4348930	3.0	0.050	8.0
KC11-26-7A	271351	4348904	37.6	0.054	26.0
KC11-26-7B	271348	4348910	44.0	0.058	93.0
KC11-29-1	271118	4348955	83.8	0.175	95.0



KC11-29-3	271247	4349087	83.7	2.110	5610.0
KC11-29-4	271067	4349120	288.0	0.043	82.0
KC11-5-11	271363	4348712	29.2	0.134	8.0
KC11-5-12	271193	4348719	223.0	0.107	31.0
KC11-5-13	271245	4348657	29.1	0.104	10.0
KC11-5-14A	271173	4348611	30.0	0.113	52.0
KC11-5-14B	271173	4348611	40.4	0.083	10.0
KC11-5-17	271083	4348670	585.0	0.126	22.0
KC11-5-18	271033	4348644	43.4	0.096	19.0
KC11-5-19	271065	4348796	1010.0	0.081	23.0
KC11-5-20	271043	4348867	3000.0	0.309	654.0
KC11-5-21A	271076	4348862	227.0	0.089	76.0
KC11-5-21B	271076	4348862	34.8	0.069	17.0
KC11-5-22	271124	4348840	1320.0	0.272	26.0
KC11-5-23	271132	4348837	105.0	0.321	8.0
KC11-5-24	271210	4348770	69.0	0.054	14.0
KC11-5-25	271188	4348746	180.0	0.063	13.0
KC11-5-26	271206	4348750	94.2	0.106	13.0
KC11-5-27A	271207	4348747	120.0	0.088	16.0
KC11-5-27B	271207	4348747	26.6	-0.020	12.0
KC11-5-28	271224	4348760	86.6	0.439	19.0
KC11-5-29A	271216	4348781	1310.0	0.146	38.0
KC11-5-29B	271216	4348781	353.0	0.093	34.0
KC11-5-30	271267	4348826	81.2	0.113	41.0
KC11-5-31	271093	4348884	67.9	0.034	22.0
KC11-5-32	271271	4348837	21.6	-0.020	14.0
KC11-5-33	271261	4348837	78.6	0.156	21.0
KC11-5-34	271302	4348880	36.3	0.127	16.0
KC11-5-35	271292	4348876	100.0	0.154	30.0
KC11-5-36	271219	4348831	95.1	0.024	19.0
KC11-6-1	271664	4348636	2170.0	0.047	48.0
KC11-6-2	271618	4348594	33.0	-0.020	14.0
KC11-6-3	271597	4348647	985.0	0.040	97.0
KC11-6-4A	271620	4348662	2550.0	0.082	46.0
KC11-6-4B	271620	4348662	1150.0	0.077	38.0
KC11-6-4C	271620	4348662	137.0	0.147	22.0
KC11-6-4D	271620	4348662	186.0	0.399	63.0
KC11-6-5	271485	4348818	589.0	0.069	51.0
KC11-6-6	271604	4348633	18.9	-0.020	39.0
KC6-12-2	272509	4348484	23.8	0.072	6.0
KC6-12-3B	272439	4348449	31.5	0.118	7.0
KC6-13-1	272417	4348161	32.5	0.185	6.0
KC6-13-5	272190	4348313	9.2	-0.020	5.0
KC6-13-6	272156	4348215	124.0	2.526	17.0
KC6-14-3	272229	4348136	131.0	0.073	21.0
KJ10-29-1	271279	4350562	48.6	0.148	18.0
KJ10-29-2	271323	4350495	73.4	0.300	12.0

KJ10-29-3	271292	4350534	111.0	0.108	16.0
KJ10-29-4	271297	4350532	97.2	0.061	13.0
KJ10-29-5	271168	4350833	228.0	0.300	28.0